

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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JOHN TABOR,

PLAINTIFF,

-AGAINST-

**NOTICE OF MOTION TO FILE  
AN AMENDED COMPLAINT**

NEW YORK CITY, DETECTIVE JAMES  
ROOPENUS, DETECTIVE MCLAUGHLIN, POLICE  
OFFICER SINGLETARY, ASSISTANT DISTRICT  
ATTORNEY KEISHA ESPINAL, ASSISTANT  
DISTRICT ATTORNEY LAUREN PARSONS,  
ASSISTANT DISTRICT ATTORNEY KENNETH  
APPLEBAUM, ASSISTANT DISTRICT  
ATTORNEY MARJORIE FISHER, DISTRICT  
ATTORNEY RICHARD BROWN, AND POLICE  
COMMISSIONER RAYMOND KELLY, IN THEIR  
INDIVIDUAL AND PROFESSIONAL  
CAPACITIES.

11- CV-0195 (FB)(CLP)

DEFENDANTS.

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PLEASE TAKE NOTICE that upon the annexed Declaration of Duncan Peterson and accompanying exhibits, and the supporting Memorandum of Law dated August 18, 2011, Plaintiff John Tabor will move this Court, before the Honorable Pollak at the United States Courthouse for the Eastern District of New York located at 225 Cadman Plaza East, Brooklyn, New York, for an order pursuant to Rule 15 (a) (2) of the Federal Rules of Procedure, granting

Plaintiff permission to amend the Complaint by adding two defendants, ADA Schindhelm and Police Officer Picone, together with such other relief as this Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that, in accordance with the Honorable Pollak's individual rules, opposition papers, if any, are due on or before September 2, 2011.

PLEASE TAKE FURTHER NOTICE that, in accordance with the Honorable Pollak's individual rules, reply papers, if any, are due on or before September 9, 2011, and the motion will be fully briefed at that time.

Dated: New York, New York

August 18, 2011



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